

**WEINSTIEN KITCHENOFF & ASHER LLC**

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*Settlement Class Counsel for  
Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**IN RE DUCTILE IRON PIPE FITTINGS  
("DIPF") INDIRECT PURCHASER  
ANTITRUST LITIGATION**

Civ. No. 12-169 (AET)(LHG)

**NOTICE OF MOTION BY INDIRECT PURCHASER PLAINTIFFS'  
FOR A PROTECTIVE ORDER PRECLUDING RULE 30(B)(6) DEPOSITION**

PLEASE TAKE NOTICE that on June 8, 2016, or as soon thereafter as counsel may be heard, Settlement Class Counsel move before the Honorable Lois H. Goodman, U.S.M.J., United States District Court, District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey, for an Order granting final approval to settlements between Indirect Purchaser Plaintiffs and Defendants SIGMA and Star, finally certifying the Settlement Classes, and allowing for the creation of an escrow fund, in the amount of \$459,250, to be used solely for litigation expenses incurred and to be incurred in the prosecution of this action against Defendant McWane.

In support of their motion, the movant will rely upon the accompanying Memorandum of Law, Declaration and Exhibits. A proposed Order is filed herewith.

Dated: May 9, 2016

*s/ Robert S. Kitchenoff*

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